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**Pro Hac Vice Forthcoming*

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF UTAH**

RALPH MADDOX, individually and on)
 behalf of all others similarly situated,)
)
 Plaintiff,)
)
 vs.)
)
)
 PROG LEASING, LLC, a Delaware limited)
 liability company doing business as)
 PROGRESSIVE LEASING,)
)
 Defendant.)
)
 _____)

**NOTICE OF FILING OF MOTION
 TO CONSOLIDATE**

Case No. 2:23-cv-797-DAO

Pursuant to DUCivR42-1(b), Plaintiff Ralph Maddox (“Plaintiff”) hereby gives notice that the plaintiff in *Dreger v. Progressive Leasing*, D. Utah Case No. 2:23-cv-00783 (the “First Action”), has filed a motion to consolidate this case into the First Action.

Dated this 19th day of December, 2023.

MARSHALL OLSON & HULL, PC

By: Jason R. Hull
Jason R. Hull [11202]

**MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN LLC**
Gary M. Klinger

*Attorneys for Plaintiff and
the Putative Class*

CERTIFICATE OF SERVICE

I hereby certify that on December 19, 2023, a copy of the foregoing pleading was filed electronically with the Clerk of Court to be served by operation of the court's electronic filing system to all counsel of record.

/s/ Jason R. Hull